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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

February 11, 2021

MEMORANDUM ENDORSED

By ECF

The Honorable Gregory H. Woods United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Kromah, et al., 19 Cr. 338 (GHW)

Dear Judge Woods:

Pursuant to the Court's direction at the initial appearance of defendant Mansur Mohamed Surur held on February 11, 2021, the Government has conferred with defense counsel for defendants Moazu Kromah and Amara Cherif regarding the status conference as to those defendants currently scheduled for March 15, 2021. Counsel for both Mr. Kromah and Mr. Cherif consent to an adjournment of the March 15 conference to April 19, 2021, and further consent to an exclusion of time under the Speedy Trial Act through that date.

Accordingly, the Government respectfully requests that the conference currently scheduled for March 15, 2021, be adjourned to April 19, 2021, at 11:00 AM, to permit all defendants to appear at the same proceeding. Out of an abundance of caution, the Government further requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through the new conference date, in order to allow defense counsel to continue their review of discovery and

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¹ See United States v. Pena, 793 F.2d 486, 489 (2d Cir. 1986) (noting that "multiple defendants are governed by a single speedy trial clock").

to allow additional time for any discussions concerning a potential pretrial resolution of this matter.²

Respectfully submitted,

AUDREY STRAUSS United States Attorney Southern District of New York

By: /s/ Jarrod L. Schaeffer

Jarrod L. Schaeffer Sagar K. Ravi

Assistant United States Attorneys Tel.: (212) 637-2270 / 2195

cc: Counsel of Record (via ECF)

Application granted. The conference currently scheduled for March 15, 2021 is adjourned to April 19, 2021 at 11:00 a.m. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 83.

SO ORDERED.

Dated February 16, 2021

GREGORY H. WOODS
United States District Judge

² A proposed order is appended hereto as Exhibit A.